

PCB INSPECTION REPORT

FACILITY

Talbot Industries
1211 Harmony Street
Neosho, MO 64850
(417) 451-5900

Date: December 4, 2014
Inspection No. 1204141000401
Docket No. 07-15-T-013

INTRODUCTION

This facility was selected under the Regional Neutral Scheme as a random selection. The reason for the inspection was to determine compliance with PCB regulations, as codified in 40 CFR, Part 761.

SUMMARY OF OBSERVATIONS

No apparent deviations from PCB regulations were observed during this inspection.

No samples, documents, or photographs were taken.

HISTORY OF BUSINESS

Talbot Industries manufactures wire point of sale fixtures and other wire products. They are a subsidiary of Leggett & Platt, Incorporated. They have been in business at this location approximately 52 years and under present ownership since 1994.

The facility consists of two buildings covering approximately 125,000 square feet. There are approximately 100 employees.

The Chief Executive Officer of the company is Mr. David Haffner. His address is One Leggett Road, Carthage, Missouri.

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

Ms. Trish Crane, Safety & Environmental Manager, was interviewed. Ms. Crane signed and received copies of all inspection documents, provided information about the facility, accompanied me during the physical inspection, and was present during the closing discussion.

INSPECTION

On December 4, 2014, at approximately 8:45 a.m., I, David Giarratano, presented my credentials to Ms. Trish Crane, Safety & Environmental Manager. I advised her that the facility had been selected for inspection under the Regional Neutral Scheme as a random selection. I issued the Notice of Inspection and Confidentiality Notice to Ms. Crane, who signed and received copies of both. Ms. Crane stated there would be no claim of confidentiality.

I asked if the facility owned any transformers or capacitors. Ms. Crane said that the main transformers providing service to the facility were owned by Empire District Electric Company. She added that there was some dry-type electrical equipment owned by the facility. We left the office for the physical inspection.

We went outside to look at the main transformers. There were six pole-mounted transformers located on the east side of the building. They did not appear to be leaking.

PCB INSPECTION REPORT

Talbot Industries
Neosho, Missouri
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Ms. Crane showed me around the building. We went through the production area to the main electrical center located on the east wall of the building. There were dry switches and circuit breakers in this location. We continued through the production area. There were two electrical centers on the west wall. Each of these contained dry switches, circuit breakers and a dry-type transformer. I saw no oil filled electrical equipment in the building.

We then went outside the building. On the west side of the building there were two pad-mount transformers. They did not appear to be leaking. This completed the physical inspection.

We went back to the office for the closing discussion.

CLOSING CONFERENCE

The closing conference was with Ms. Trish Crane, Safety & Environmental Manager.

I told her I observed no apparent deviations from PCB regulations during the inspection. Ms. Crane signed and received copies of the Receipt for Samples, Declaration of CBI, and Summary of Observations.

SUBMITTED BY:



David J. Giarratano, Chief
Special Facilities Unit
Compliance and Enforcement Section
Hazardous Waste Program
December 10, 2014

APPROVED BY:



Kathy S. Flippin, Chief
Compliance and Enforcement Section
Hazardous Waste Program

KSF:dga

ATTACHMENTS

1. Notice of Inspection
2. Summary of Observations
3. Receipt for Samples
4. Confidentiality Notice
5. Declaration of CBI
6. ICDS



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 12/04/14	INSPECTOR'S NO. 10004	DAILY SEQ. NO. 01	Talbot Industries
2. INSPECTOR'S ADDRESS Missouri Department of Natural Resources/HWP P.O. Box 176 Jefferson City, MO 65102-0176			4. FACILITY ADDRESS 1211 Harmony Neosho, Mo 64850

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE 		RECIPIENT'S SIGNATURE 	
NAME David Giarratano		NAME Trish Crane	
TITLE Env. Spec.	DATE SIGNED 12/4/14	TITLE H&S Mgr	DATE SIGNED 12/9/14

EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA — PREVIOUS VERSIONS ARE OBSOLETE

Recipient's COPY

Attachment 1

U.S. ENVIRONMENTAL PROTECTION AGENCY
TSCA INSPECTION
SUMMARY OF OBSERVATIONS

Name and Address of Inspector(s) <i>David Giarratano</i> MDNR/HWP P.O. Box 176 Jefferson City, MO 65102		Name and Address of Facility <i>Talbot Industries</i> <i>1211 Harmony St</i> <i>Neosho, Mo 64850</i> Chief Executive Officer of Firm <i>Dave Haffner</i>	
Name of Individual to Whom Notice Given <i>Trish Crane</i>		Title <i>CEO</i>	
Title <i>H&S Mgr</i>	Date <i>12/4/14</i>	Address <i>1 Liggett Road</i> <i>Cothage Mo</i>	

The following possible deviations from the requirements of the Toxic Substances Control Act and regulations promulgated thereto were observed during this inspection:

no apparent deviations from PCB regulations were observed during this inspection

This Summary of Observations is provided to bring to your attention those areas of concern at the earliest possible time. It is not intended to be a complete list of deviations from the requirements of the Toxic Substances Control Act and regulations thereto, but rather a list of those conditions of immediate concern and/or those readily apparent. If you have any questions regarding this summary, please contact the Chemical Risk Information Branch at 913/551-7020.

The undersigned acknowledges having received and read a copy of this TSCA Summary of Observations.

<i>Trish Crane</i>		<i>H&S Mgr</i>		<i>12/4/14</i>	
Signature		Title		Date	
<i>[Signature]</i>		<i>ENV SPC</i>		<i>12/4/14</i>	
Signature of Inspector		Title of Inspector		Date	

Distribution: White - Regional Office Copy
Yellow- Facility Copy



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION

DATE
12/04/14

INSPECTION NO.
10004

DAILY SEQ. NO.
01

2. COMPANY NAME

Talbot Industries

3. INSPECTOR ADDRESS

MDNR/HWP
P.O. Box 176
Jefferson City, MO 65102

4. COMPANY ADDRESS

1211 Harmony St
Neosho, MO 64850

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.

DESCRIPTION

no samples, documents or photographs were taken

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐

NOT REQUESTED ☐

INSPECTOR SIGNATURE

CLAIMANT SIGNATURE

NAME

NAME

David Giarattano

Trish Crane

TITLE

DATE SIGNED

TITLE

DATE SIGNED

Env. Spec.

12/4/14

HHS mgr

12/4/14

Attachment 2

INSPECTOR'S COPY



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			4. FACILITY NAME
DATE 12/04/14	INSPECTION NO. 10084	DAILY SEQ. NO. 01	Talbot Industries 1211 Harmony
2. INSPECTOR'S NAME David Giaratano			5. ADDRESS Neosho, MO 64850
3. INSPECTOR'S ADDRESS Missouri Department of Natural Resources/HWP P.O. Box 176 Jefferson City, MO 65102-0176			6. NAME OF CHIEF EXECUTIVE OFFICER Dave Haffner
			7. TITLE CEO

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

EPA Region 7 - TSCA FOIA Officer
11201 Renner Blvd.
Lenexa, KS 66219

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE
I acknowledge receipt of this notice:

If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.

SIGNATURE <i>Trish Crace</i>	NAME
NAME Trish Crace	TITLE
TITLE H&S Mgr	DATE SIGNED 12/4/14
ADDRESS	

ALL shown 1/14



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION

DATE 12/04/14 INSPECTION NO. 10004 DAILY SEQ. NO. 01

2. COMPANY NAME

Talbot Industries

3. INSPECTOR ADDRESS

MDNR/HWP
P.O.Box 176
Jefferson City, MO 65102

4. COMPANY ADDRESS

1211 Harmony
Neosho Mo 64850

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of TSCA Confidential documents described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
	none declared

INSPECTOR SIGNATURE

[Signature]

CLAIMANT SIGNATURE

[Signature]

NAME

David Giarratano

NAME

Trish Crane

TITLE

Env. Spec.

DATE SIGNED

12/4/14

TITLE

H&S Mgr

DATE SIGNED

12/4/14

Att. Schmitt & S

January 7, 2015

Ms. Trish Crane
Safety & Environmental Manager
Talbot Industries
1211 Harmony Street
Neosho, Missouri 64850

NOTICE OF COMPLIANCE
Case Number: 07-15-T-013

Dear Ms. Crane:

This notice provides formal notification of the results of the December 4, 2014, inspection of Talbot Industries, conducted pursuant to Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761.

On the date of the inspection, it appears the facility was in compliance with the PCB Final Rule.

Please direct any inquiries concerning this inspection or your responsibilities under the PCB Final Rule to my attention at the letterhead address, by telephone at (913) 551-7517 or by e-mail at matthews.marc@epa.gov.

Sincerely,

Marc A. Matthews
Environmental Engineer
Waste Enforcement and Materials Management
Branch

Enclosure: PCB Inspection Report, Talbot Industries

cc: David Giarratano, Missouri Department of Natural Resources

H:\AWMD\RESP\WEMM BRANCH\Correspondence\Matthews\FY 2015\Talbot Industries PCB NOC Letter.MRW.01052015.docx

Office	WEMM	WEMM
Name	Matthews <i>[Signature]</i>	Sehnert-Jones
Initial/Date	<i>[Signature]</i> 1/6/15	CSJ 1/6/15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

January 7, 2015

Ms. Trish Crane
Safety & Environmental Manager
Talbot Industries
1211 Harmony Street
Neosho, Missouri 64850

NOTICE OF COMPLIANCE
Case Number: 07-15-T-013

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Please direct any inquiries concerning this inspection or your responsibilities under the PCB Final Rule to my attention at the letterhead address, by telephone at (913) 551-7517 or by e-mail at matthews.marc@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc A. Matthews".

Marc A. Matthews
Environmental Engineer
Waste Enforcement and Materials Management
Branch

Enclosure: PCB Inspection Report, Talbot Industries

cc: David Giarratano, Missouri Department of Natural Resources



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